

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

MARY DESMOND, THOMAS ZIOBROWSKI, :  
AND PAUL WATTS, on their own behalf and on :  
behalf of other participants in the defendant ERISA :  
Plans : CIVIL ACTION  
Plaintiff :

v. : 05-10355-NG  
:

MORTON C. BATT, ANTHONY L. :  
SCIALABBA, CITISTREET, LLC, WHITE & :  
WILLIAMS, LLP, SCIALABBA & MORRISON, :  
P.C., THE STANDARD AUTOMOTIVE 401(K) :  
PLAN, AND THE STANDARD AUTOMOTIVE :  
EMPLOYER CONTRIBUTION PLAN :  
Defendant :

**JOINT STIPULATION AND ORDER TO EXTEND TIME TO ANSWER OR  
OTHERWISE RESPOND TO THE COMPLAINT**

Plaintiffs Mary Desmond, Thomas Ziobrowski, and Paul Watts and Defendant White and Williams LLP, by their undersigned counsel, hereby stipulate and agree that the time within which White and Williams LLP must answer or otherwise respond to the Complaint is extended up to, and including June 30, 2005, and respectfully request that the Court grant this stipulated extension of time.

Respectfully submitted,  
**MARY DESMOND, THOMAS  
ZIOBROWSKI, AND PAUL WATTS**

**WHITE AND WILLIAMS LLP**

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Matthew A. Caffrey  
Thomas P. Smith  
CAFFREY & SMITH, P.C.  
300 Essex Street  
Lawrence, MA 01840  
(508) 686-3399

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/s/ Michael F. Kraemer  
Michael F. Kraemer (#657156)  
HINCKLEY, ALLEN & SNYDER LLP  
1500 Fleet Center  
Providence, RI 02903  
(401) 274-2000

Dated: June 14, 2005

SO ORDERED:

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Nancy Gertner, U.S.D.J.

CERTIFICATION

I, Michael F. Kraemer, served a copy of the foregoing document on those parties whose counsel have registered with the Court's EFC service by employing such service for filing this document and upon pro se defendant Morton C. Batt on June 14, 2005 by mailing a copy to:

Morton C. Batt  
2424 NW 63rd Street  
Boca Raton, FL 33496-3626

/s/ Michael F. Kraemer

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